3.16 HEALTH AND SAFETY

Updates to this section of the Draft EIS resulted from additional information provided by the Applicant and information obtained in response to public comments on the Draft EIS. Updated text and revisions to Table 3.16-5 in this section based on the new information are presented below.

- On Page 3.16-1 in the Draft EIS, the last two sentences in the second paragraph should be deleted and replaced with the following text.

A Health and Safety Plan and Emergency and Security Plan would be developed for the cogeneration facility. These plans would be developed in coordination with the refinery's existing plans. Where additional sources of information have been used to evaluate the potential impacts associated with the proposal, those sources have been cited.

- In Table 3.16-1 on Page 3.16-2, the tenth bullet under the subheading "Applicable Industry Requirements" should be deleted and replaced with the following.

- Uniform Building Code 97;

3.16.2 Impacts of the Proposed Action

- On Page 3.16-15 in the Draft EIS, the following text should be added after the fourth paragraph.

As described in Section 3.15.2, trucks would deliver anhydrous ammonia to the cogeneration facility approximately twice a month; currently ammonia is delivered to the refinery twice a year. It is anticipated that the additional ammonia needed for the Selective Catalytic Reduction (SCR) would be supplied by local suppliers, and delivery trucks would use the same delivery routes as used today. All ammonia delivery trucks would need to follow appropriate federal, state, and local permitting requirements. In addition, the cogeneration facility's Risk Management Plan would identify and describe actions to be taken by the refinery and public emergency response personnel in case of an accidental spill or traffic accident involving the release of ammonia to the environment.

- On Page 3.16-17 in the Draft EIS, the second full paragraph should be deleted and replaced with the following text.

Applicant-proposed mitigation measures to be implemented in case of an accidental ammonia release are summarized in Section 3.16.5. Additional modeling would be performed for the Risk Management Plan to identify the probable area of exposure to ammonia at a concentration of 200 ppm or higher under a realistic release scenario. This modeling, which would be done to assess health impacts from such an exposure, is not required at this time.

- On Page 3.16-20 in the Draft EIS, the following text should be added before the last row in Table 3.16-5.

Sodium Bromide	100 to 700 gallons	800 gallons	Cooling water treatment

- After the first paragraph on Page 3.16-21 in the Draft EIS, the following heading and text should be added.

Cooling Tower Inhibitor

Biocides would be added to the cooling water to control bacterial formation in the cooling tower, and thereby prevent or reduce the formation of *Legionella* bacteria. A mixture of bleach (15% aqueous solution of sodium hypochlorite) and sodium bromide (40% aqueous solution) would be added to the circulating water in a ration of 10:1. This is the same biocide formulation that is used in the existing refinery cooling towers. Generally, industrial cooling systems are less prone to bacterial formation because they operate continuously, unlike indoor Heating/Ventilation/Air - Conditioning (HVAC) systems that have been most prone to outbreaks of Legionnaires' disease. Continuous operation keeps the biocides well mixed in the circulating water and reduces stagnant conditions where bacteria can develop and reproduce.

- After the third paragraph on Page 3.16-21 in the Draft EIS, the following heading and text should be added.

Air Emissions

A discussion of potential health impacts resulting from inhalation of $PM_{2.5}$ can be found in Section 3.2.3 of the Final EIS.